

The Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JOHN HENRY BROWNE and ALAN J.
WENOKUR, individually and on behalf of
others similarly situated,)
Plaintiffs,)
v.)
AVVO, INC., MARK BRITTON, and JOHN
DOES 1-25,)
Defendants.)
)
No. CV7 920 RSL
SUPPLEMENTAL
DECLARATION OF KAREN
SHAAK IN SUPPORT OF
DEFENDANTS' MOTION TO
DISMISS CLASS ACTION
COMPLAINT
Note on Motion Calendar:
August 10, 2007

Karen Shaak declares as follows:

1. ***Identity of Declarant.*** I am Program Manager for Avvo, Inc., in Seattle, Washington. I have held this position since September 11, 2006. In this position, I am responsible for various aspects of software development, testing, and design, including coordination of the development process with members of Avvo's business and development teams. As part of my job responsibilities, I have access to the servers upon which Avvo stores its databases, including the systems and tools to access data. I make this declaration based upon my personal knowledge acquired in this position.

2. ***Pages Available On Date of Complaint.*** I have read Plaintiff's Complaint, which refers to a variety of pages on Avvo's website prior to changes made to the site on June 26, 2007. Archived screenshots of pages from Avvo's previous site, however, presently

SUPPLEMENTAL DECLARATION OF KAREN SHAAK (CV7-920 RSL) — 1

SEA 2062512v1 0084269-000001

Davis Wright Tremaine LLP
LAW OFFICES
Suite 2200 • 1201 Third Avenue
Seattle, Washington 98101-3045
(206) 622-3150 • Fax: (206) 757-7700

1 reside on Avvo's servers and are attached as Exhibit A. If a reader had visited Avvo's
2 website on June 14, 2007, the day the Complaint was filed, these pages would have been
3 available to them.

4 I declare under penalty of perjury that the foregoing is true and correct.
5 Executed on August 7, 2007, in Seattle, Washington.

6
7 
8 Karen Shaak

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

SUPPLEMENTAL DECLARATION OF KAREN SHAAK (CV
920 RSL) — 2
SEA 2062512v1 0084269-000001

Davis Wright Tremaine LLP
LAW OFFICES
Suite 2200 • 1201 Third Avenue
Seattle, Washington 98101-3045
(206) 622-3150 • Fax: (206) 757-7700

CERTIFICATE OF SERVICE

I hereby certify that on August 10, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Steve W. Berman – steve@hbsslaw.com

Jeniphr A.E. Breckenridge – jeniphr@hbsslaw.com

Robert Gaudet, Jr. – robertg@hbsslaw.com

Davis Wright Tremaine LLP
Attorneys for Defendants Avvo, Inc. and
Mark Britton

By s/Bruce E.H. Johnson
Bruce E. H. Johnson, WSBA # 7667
Stephen M. Rummage, WSBA # 11168
Ambika K. Doran, WSBA # 38237
1201 Third Avenue, Suite 2200
Seattle, Washington 98101-3045
Telephone: (206) 757-8069
Fax: (206) 757-7069
E-mail: brucejohnson@dwt.com,
steverummage@dwt.com,
ambikadoran@dwt.com